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Counsel to Broadway Avenue Investments, LLC

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

In re:
SEATON INVESTMENTS, LLC, *et al.*,
Debtors and Debtors In Possession.

- ☐ Affects All Debtors.
☐ Affects Seaton Investments, LLC
☐ Affects Colyton Investments, LLC
☒ Affects Broadway Avenue Investments, LLC
☐ Affects SLA Investments, LLC
☐ Affects Negev Investments, LLC
☐ Affects Alan Gomperts
☐ Affects Daniel Halevy
☐ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
2:24-bk-12076-VZ

Chapter 11

**DECLARATIONS IN SUPPORT OF
MOTIONS OF DEBTOR AND
DEBTOR IN POSSESSION
BROADWAY AVENUE
INVESTMENTS, LLC FOR
ORDERS:
1) AUTHORIZING DEBTOR TO
OBTAIN POST-PETITION
FINANCING PURSUANT TO 11
U.S.C. § 364; AND 2)
AUTHORIZING DEBTOR TO
ENTER INTO POST-PETITION
LEASE**

Hearing:

Date: February 25, 2025
Time: 11:00 a.m.
Courtroom: 1368
255 E. Temple Street
Los Angeles, CA 90012

WEINTRAUB ZOLKIN TALERICO & SELTH LLP
11766 WILSHIRE BLVD., SUITE 730
LOS ANGELES, CA 90025

Broadway Avenue Investments, LLC (“Broadway”), one of the debtors and debtors-in-possession in the pending jointly administered chapter 11 bankruptcy cases herein, hereby files the attached declarations (“Declarations”) in support of the concurrently filed *Motion of Debtor and Debtor in Possession Broadway Avenue Investments, LLC for Order Authorizing Debtor to Obtain Post-Petition Financing Pursuant to 11 U.S.C. Section 364; Memorandum of Points and Authorities* (the “Financing Motion”); and *Motion of Debtor and Debtor in Possession Broadway Avenue Investments, LLC for Order Authorizing Debtor to Enter into Post-Petition Lease; Memorandum of Points and Authorities* (the “Lease Motion,” and with the Financing Motion, the “Motions”):

- *Declaration of Alan D. Gomperts*;
- *Declaration of Daniel Halevy* and related exhibit;
- *Declaration of Christopher Maling* and related exhibit;
- *Declaration of Jack Stephens* and related exhibits; and
- *Declaration of Auriel Streit* and related exhibits.

Dated: February 4, 2025

WEINTRAUB ZOLKIN TALERICO & SELTH LLP

By: /s/ Derrick Talerico

Derrick Talerico
Counsel to Debtor Broadway Avenue Investments, LLC,

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